

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HC2, INC.,

Plaintiff,

v.

ANDREW DELANEY,

Defendant.

Civil Action No.: 20-cv-3178 (LJL)

**DECLARATION OF NICK RADOICIC IN
SUPPORT OF HC2'S OPPOSITION TO
PLAINTIFF'S MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(b)(1)**

I, Nick Radoicic, declare as follows:

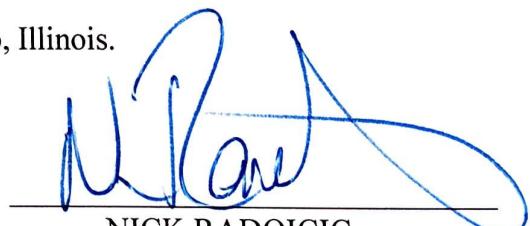
1. I am the Senior Director of Operations of Plaintiff HC2, Inc. ("HC2"). I am a legal resident of Indiana.
2. I have personal knowledge of all the facts stated herein based on my personal knowledge and my review of Plaintiff's records.
3. I have worked as Senior Director of Operations since January 9, 2018, out of the Chicago office. In my role, I oversee all operations involving special projects and e-discovery, recruiting, and marketing. I also work closely with the human resources and finance departments, which are based out of Chicago, to ensure that our contract attorneys and employees are successfully on-boarded and credentialed. These operations are critical to execution of our business.
4. I oversee the Special Project Attorney (SPA) recruitment division which recruits high-level temporary attorneys and places them with HC2's clients. I also work with Denise Asnes, who handles the Project Based Staffing (PBS) aspect of recruitment and works out of Philadelphia. In May 2019, I held a full team meeting out of the Chicago office, where both the SPA and PBS teams came together for a conference.

5. I have four direct reports, three based out of Chicago and one based out of Boston. I hold my staff meetings in Chicago, with one employee dialing in remotely.

6. In mid-2018, when HC2 decided to move to a bigger office space in Chicago to accommodate management and its growing employee base, I became involved in the operations of the move. For instance, I helped devise the layout of our corporate office, secure a quote for the construction, purchased new furniture for the office space, and handled the invoicing. HC2 spent almost \$20,000 in furniture in 2019 to furnish the new office space. HC2's current Chicago office is the largest in terms of physical space and number of key employees in comparison to all of its office spaces across the nation. These events all predate April 22, 2020.

7. I assumed the role and responsibilities of overseeing HC2's marketing in June 2020. HC2 contracts with an advertising company based in Chicago, and I oversee and direct all projects with that company to create and implement HC2's marketing campaigns.

I declare under penalty of perjury that the above is true and correct, and that I executed this declaration this 10th day of January 2021 in Chicago, Illinois.



NICK RADOICIC

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